

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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ACCESS 4 ALL, INC., a Not-for-Profit  
Corporation, and FELIX ESPOSITO, Individually,

Plaintiffs,

v.

GSH LODGING, LLC, a Delaware Limited  
Liability Company,

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Defendant.

JAN 18 2005

Case Number: 1:04-12238-JLT-RBC

**MOTION OF THE PLAINTIFF TO  
PERMIT COUNSEL TO APPEAR  
PRO HAC VICE**

FILING FEE PAID:  
RECEIPT # 61520  
AMOUNT \$ 50.00  
BY DPTY CLK  
DATE 1/19/05

In accordance with 83.5.3(b) of the Local Rules of the United States District Court  
District of Massachusetts that governs the admission and practice of attorneys in said District  
Court, the undersigned respectfully moves for the admission of **John P. Fuller, Esquire**,  
12000 Biscayne Blvd., Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes  
of appearing as counsel on behalf of Plaintiffs, Felix Esposito and Access 4 All, Inc., in the  
above-styled case.

John P. Fuller certified herewith that he has studied the Local Rules of this Court and  
is a member in good standing of the Florida Bar; and is admitted to the United States District  
Court for the Southern, Middle and Northern Districts of Florida, as well as the United States  
Court of Appeals for the Fifth and Eleventh Circuits. Mr. Fuller's Florida Bar Number is  
0276847. There are no disciplinary proceedings against Mr. Fuller in any jurisdiction. A  
certificate of good standing from the Supervisor, Membership Records of the Florida Bar  
is attached hereto as Exhibit A. Mr. Fuller is a partner with the law firm of Fuller, Fuller &  
Associates, P.A. and has been a member of the Florida Bar for over twenty (20) years. An  
Affidavit of John P. Fuller in Support of this Motion to Admit Counsel Pro Hac Vice is  
attached hereto as Exhibit B.

In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

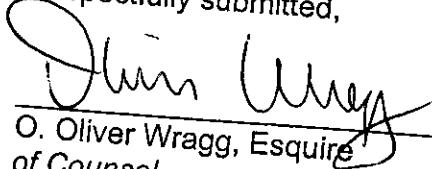
Mr. Fuller is familiar with the Local Rules of the United States District Court for the District of Massachusetts and his application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiffs, Felix Esposito and Access 4 All, Inc. Additionally, Mr. Fuller has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant John P. Fuller permission to appear before this Court pro hac vice.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the Plaintiffs have conferred with counsel for the Defendant and that the counsel for Defendant have assented to the foregoing motion.

Respectfully submitted,

  
O. Oliver Wragg, Esquire  
of Counsel  
FULLER, FULLER AND ASSOCIATES, P.A.  
(BBO#: 643152)  
12000 Biscayne Blvd., Suite 609  
North Miami, Florida 33181  
Tel: (305) 891-5199  
Fax: (305) 893-9505

I hereby certify that a true and correct copy of the foregoing has been furnished to David S. Rosenthal; Nixon Peabody, LLP; 100 Summer Street; Boston, MA 02110-1000; via U.S. Mail on this 11 day of January 2005.